

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

ROBERT MICHAELSON OF
ADVISORY TRUST GROUP, LLC, IN
HIS CAPACITY AS DEBTOR
REPRESENTATIVE AND
LIQUIDATING TRUSTEE,

Plaintiff,

v.

PETER BARONOFF, KEITH REUBEN,
BRIAN DUNN, DAVID ARMSTRONG,
JAMES HOPWOOD, RICHARD GOLD,
BRYAN DAY, STAN GRABISH,
RICHARD COHEN, STEVEN
HELLAND, MALINDA BARONOFF,
SHANNA BARONOFF, and JOHN DOES
1-100,

Defendants.

Civil Action No. 1: 20-cv-01465-MN

**STIPULATION AND AGREED ORDER TO EXTEND DEADLINES FOR
DEFENDANT MALINDA BARONOFF**

The above-captioned plaintiff, Robert Michaelson of Advisory Trust Group, LLC, in his Capacity as Debtor Representative and Liquidating Trustee (“Plaintiff”) and defendant, Malinda Baronoff (“Defendant” and with Plaintiff, the “Parties”), jointly submit this *Stipulation and Agreed Order to Extend Deadlines for Defendant Malinda Baronoff between the Parties* (the “Stipulation and Order”) and respectfully represent as follows:

WHEREAS, on October 28, 2020, Plaintiff filed the *Complaint* [Docket No. 1] (the “Complaint”) with the United States District Court for the District of Delaware.

WHEREAS, Defendant, having contacted Plaintiff regarding an extension of time to respond to the Complaint, and Plaintiff consenting to such an extension, the Parties stipulate and agree that:

1. The deadline for Defendant to answer or otherwise respond to the Complaint shall be extended to and including February 19, 2021.
2. The deadline for Plaintiff to answer or otherwise respond to Defendant's motion to dismiss or other similar pleading filed in response to the Complaint shall be extended to and including April 20, 2021.
3. The Parties reserve the right to seek further extensions of the deadlines set forth herein.

IT IS SO ORDERED, this _____ day of _____, 2020

Honorable Maryellen Noreika
United States District Court Judge

Stipulated and agreed to by:

PACHULSKI STANG ZIEHL & JONES LLP

/s/ Colin R. Robinson

Bradford J. Sandler, Esq.

Andrew W. Caine, Esq.

Colin R. Robinson, Esq.

919 N. Market Street, 17th Floor

Wilmington, DE 19801

Telephone: (302) 652-4100

Facsimile: (302) 652-4400

E-mail: bsandler@pszjlaw.com

acaine@pszjlaw.com

crobenson@pszjlaw.com

-and-

SILLS CUMMIS & GROSS P.C.

Andrew H. Sherman (*pro hac vice* admission to be requested)

Boris I. Mankovetskiy (*pro hac vice* admission to be requested)

Rachel E. Brennan (*pro hac vice* admission to be requested)

One Riverfront Plaza

Newark, NJ 07102

Telephone: (973) 643-7000

Facsimile: (973) 643-6500

Email: asherman@sillscummis.com

bmandkovetskiy@sillscummis.com

rbrennan@sillscummis.com

Counsel to Robert Michaelson of Advisory Trust Group, LLC, in his capacity as Debtor Representative and Liquidating Trustee

-and-

BRODSKY FOTIU-WOJTOWICZ

/s/ Benjamin H. Brodsky

Benjamin H. Brodsky (*pro hac vice* admission to be requested)

200 SE 1st Street

Miami, FL 33131

Email: bbrodsky@bfwlegal.com

Counsel to Malinda Baronoff